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PUBLIC COMMENT

RE: Amendments of Parts 73 and 74 to Improve the LPFM Radio Service Technical Rules Notice of Proposed Rulemaking – MB Docket Nos. 19-193, 17-105

Before the FCC is consideration for modifications to the technical service of LPFM radio.

It has been my pleasure to assist LPFM's like WNHS LP Newcomerstown OH, KPGC LP Norman AR, and WDNP LP Dover – New Philadelphia OH and numerous others over the past 15 years in licensing, construction, technical assistance, and even programming.

EVERY single LPFM I've been a part of has been a true "local voice" to their small communities. One of the greatest challenges I've seen most face is the issue related to proper coverage of the "town's people" within their area and signal penetration into homes even within four miles of the transmitter.

I've been in commercial and non-profit broadcasting (both on-air and engineering) for 42 years (I was 13 when I started), and I would encourage the commission to consider the ability of rural LPFM's to upgrade to a 250W ERP. This would not only improve signal penetration into local buildings (especially commercial building with steel and concrete construction) but would ensure that an entire small local community is capable of receiving the signal of these hyper-localized radio stations. If our mission for these stations is support of a small community, we MUST be sure they are truly capable of covering them with a good signal! We must keep in mind that many (like WNHS and WDNP) are in areas of Ohio where farming creates large areas between homes around the cities, and all people should have equal access to its community station. KPGC is in a rural area of Arkansas where hills and forests (as tourism destinations) greatly separate the local people, so proper coverage would be enhanced by this simply minor increase in power.

All these (and many other) LPFM's provide a large amount of community information and support, and fortunately the stations I've mentioned are very successful are relaying all emergency information (whether EAS alerts or hazardous chemical leaks at local plants!) We WANT these little community stations TO be able to reach ALL the local people, and the increase for LPFM's from 100W to 250W in rural areas of the country would provide that tiny boost needed.

In a time when the FCC has considered raising Class A FM's to 10kW, certainly it would not be unreasonable to consider, at least for rural LPFM's, to allow decent coverage to the people in their small communities by increasing to 250W.

I would also ask the FCC to consider the many LPFM's who, like their big siblings in broadcasting, been faithful and consistent community broadcasters now for years. As the commission moves forward with your many decisions, please consider enhanced protection of the LPFM signal.

Respectfully,
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